

Anna Y. Park, CA SBN 164242
Sue J. Noh, CA SBN 192134
Rumduol Vuong, CA SBN 264392
Derek W. Li, CA SBN 150122
U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
255 East Temple Street, Fourth Floor
Los Angeles, CA 90012
Telephone: (213) 894-1083
Facsimile: (213) 894-1301
E-Mail: lado.legal@eeoc.gov

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

vs.

WYNN LAS VEGAS, LLC; and DOES 1-10,
INCLUSIVE,

Defendants.

Case No.: 2:16-cv-02187-RFB-PAL

**JOINT STIPULATION FOR AN ORDER
CONTINUING THE DEADLINE TO
SUBMIT A PROPOSED JOINT
PRETRIAL ORDER; [PROPOSED]
ORDER; CERTIFICATE OF SERVICE**

Honorable Richard F. Boulware, II
United States District Judge

1 Plaintiff United States Equal Employment Opportunity Commission ("EEOC") and
2 Defendant Wynn Las Vegas, LLC ("Wynn"), by and through their undersigned counsel,
3 stipulate to the following:

4 1. On September 16, 2016, Plaintiff EEOC filed a complaint alleging that
5 Defendant Wynn violated the Americans with Disabilities Act of 1990, as amended by the ADA
6 Amendment Act of 2008 by unlawfully discriminating and retaliating against EEOC's Claimant
7 Soloman Hussey. (ECF No. 1). On November 14, 2016, Defendant Wynn filed its Answer.
8 (ECF No. 5). Subsequently, Defendant filed its Motion for Summary Judgment; and the EEOC
9 filed its Motion for Partial Summary Judgment. (ECF No. 26, 27)

10 2. On July 10, 2018, the Court denied Defendant's Motion for Summary Judgment
11 and the EEOC's Motion for Partial Summary Judgment. (Order 17, ECF No. 38). The Court
12 ordered both Parties to be referred to the Magistrate Judge for the purposes of scheduling a
13 settlement conference. (*Id.*). The Court also ordered the Parties to submit a Proposed Joint
14 Pretrial Order by August 31, 2018.

15 3. The EEOC and Defendant request for an extension of the deadline to submit a
16 Proposed Pretrial Order for two months from August 31, 2018 to October 31, 2018.

17 4. The EEOC and Defendant request for an extension of the deadline due to the
18 respective leave schedule of counsel for the remainder of July and August 2018. Defense
19 counsel represents that he will be on leave starting on July 17, 2018 for around two weeks.
20 EEOC's counsel represents that he will be on leave for a week from August 9 through 16, 2018.
21 Factoring in time to allow both Parties to prepare for settlement, including the preparation of the
22 respective settlement briefs, the Parties estimate that a reasonable scheduling of a settlement
23 conference would be no earlier than September 2018.

24 5. The EEOC and Defendant also request for an extension of the deadline to
25 conserve resources to maximize the chances of settlement. The settlement conference is likely
26 to be scheduled no earlier than September 2018. With the current deadline for the submission of
27 a Proposed Joint Pretrial Order by August 31, 2018, resources and the Parties' attention would
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1 need to be diverted to prepare a Proposed Joint Pretrial Order. Such resources may be better
2 served to attempt to settle the case first before preparing for trial.

3 6. Thus, the Parties request for an Order extending the deadline to submit a
4 Proposed Joint Pretrial Order from August 31, 2018 to October 31, 2018.

5
6 Dated: July 17, 2018

7 /s/ Derek W. Li

8 Derek W. Li
9 U.S. EQUAL EMPLOYMENT
10 OPPORTUNITY COMMISSION
11 255 East Temple Street, Fourth Floor
12 Los Angeles, CA 90012
13 Telephone: (213) 894-1077
14 Facsimile: (213) 894-1301
15 Attorneys for Plaintiff

Dated: July 17, 2018

/s/ Nicole A. Young

Scott M. Abbott #4500
Nicole A. Young #13423
Kamer Zucker Abbott
3000 West Charleston Blvd., Suite 3
Las Vegas, NV 89102
Telephone: (702) 259-8640
Facsimile: (702) 259-8646
Attorneys for Defendant Wynn Las Vegas, LLC

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19 **[PROPOSED] ORDER UPON STIPULATION**

20 For good cause shown, IT IS SO ORDERED.

21 Dated: July 18, 2018.



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RICHARD F. BOULWARE, II
United States District Judge

1 **CERTIFICATE OF SERVICE**

2 I am, and was at the time the herein mentioned delivery took place, a citizen of the
3 United States, over the age of eighteen (18) years.

4 I am employed in the Legal Unit of the Los Angeles District Office of the United States
5 Equal Employment Opportunity Commission.

6 My business address is U.S. Equal Employment Opportunity Commission, Los Angeles
7 District Office, 255 East Temple Street, 4th Floor, Los Angeles, California 90012.

8 On the date that this declaration was executed, as shown below, I served the following:

9 **1. JOINT STIPULATION FOR AN ORDER CONTINUING THE DEADLINE**
10 **TO SUBMIT A PROPOSED JOINT PRETRIAL ORDER; [PROPOSED]**
11 **ORDER; CERTIFICATE OF SERVICE**

12 via the Court's CMECF electronic filing system and/or first class mail / email to Defendant's
13 counsel:

14 Scott M. Abbott
15 Kamer Zucker & Abbott
16 3000 West Charleston Blvd, Suite 3
17 Las Vegas, NV 89102
sabbott@kzalaw.com

Nicole A. Young
Kamer Zucker & Abbott
3000 West Charleston Blvd., Suite 3
Las Vegas, NV 89102
nyoung@kzalaw.com

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19 I declare under penalty of perjury that the foregoing is true and correct. Executed on July
20 17, 2018.

21 /s/ Derek Li
22 Derek Li
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